

VIA CM/ECF AND HAND

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July 13, 2020

The Honorable Richard G. Andrews U.S. District Court for the District of Delaware 844 N. King Street Wilmington, DE 19801

Re: In re Boy Scouts of America and Delaware BSA, LLC, No. 20-cv-00798 (RGA)

Dear Judge Andrews,

We write to respectfully request that the Court grant the parties joint request to slightly modify the briefing schedule the in the above captioned matter. (D.I. 10).

The parties submitted a proposed briefing schedule to Magistrate Judge Thynge as part of their mediation submissions. The proposed stipulated briefing schedule was consented to by all parties to the appeal so that (1) Appellants' Opening Brief is due on August 31, (2) Appellees' Answering Briefs are due on September 30, and (3) Appellants' Reply Brief is due on October 14. These dates were chosen because of prior commitments of counsel in this matter and the competing demands of other motions and appeals pending in the case.

On June 30, 2020, Judge Thynge recommended that the bankruptcy appeal be withdrawn from mediation but did not transmit the parties' joint, consented-to proposal for briefing with her recommendation to Your Honor. The Court then entered a schedule without having the schedule that the parties had agreed upon and proposed to Judge Thynge.

We respectfully ask the Court to enter an order granting the parties' attached stipulated to briefing schedule. The parties believe that this brief extension is necessary to accommodate both the competing demands of other matters in the underlying bankruptcy and other scheduling conflicts, as well as the amendment to the notice of appeal that reflect the parties' agreement that Sidley Austin LLP is an appellee to the above captioned appeal.

We attach the parties' stipulated briefing schedule and ask that the Court grant the proposal. We are available at the convenience of the Court should your Honor have any questions regarding the foregoing.

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Respectfully,

Stamatios Stamoulis #4606

Counsel for Appellants Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America and Indemnity Insurance Company of North America, Westchester Fire Insurance Company and Westchester Surplus Lines Insurance Company

cc: All Registered Counsel (via <u>CM/ECF</u>)